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June 24, 2025

**BY ECF**

Honorable Harvey Bartle III, U.S.D.J.  
United States District Court for the  
Eastern District of Pennsylvania  
16614 U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106

**Re: *Atlas Data Privacy Corp., et al. v. Searchbug, Inc. et al.***  
**Case No. 1:24-cv-05658-HB**  
**Docket Entry 51 – Order to produce takedown notices**

Dear Judge Bartle:

This firm represents the defendant Searchbug, Inc. (“Defendant”) in the above-referenced matter. We respectfully request that Docket Entry 51, ORDER: Atlas shall produce to defendants on or before July 16, 2025 the dates the takedown notices were sent to the defendants as well as the "category" of covered person into which each assignor fits, be revised to state that: **Atlas shall produce to defendants on or before July 16, 2025 the dates the takedown notices were “received by” defendants**, rather than the date sent to defendants. I’ve spoken with Plaintiffs’ Counsel, Rajiv D. Parikh, about this request. Plaintiffs consent with the caveat that they intend to produce the date of delivery of the takedown notices.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kelly M. Purcaro".

KELLY PURCARO